

053/0531

10.110.17

# Teck

## PROGRESS REPORT NO. 135

**TO:** Monica Tonel, U.S. Environmental Protection Agency (EPA) – via Email  
Kathryn Cerise, EPA – via Email

**FROM:** Kris McCaig – Teck American Incorporated (TAI)

**DATE:** October 10, 2017

**FILE NO:** 01-773180-000

**RE:** Upper Columbia River (UCR) Remedial Investigation/Feasibility Study  
(RI/FS) - Progress Report No. 135 Month Ending September 2017

---

Pursuant to Paragraph 39 of the June 2, 2006 Settlement Agreement (Agreement), the following is intended to provide a summary of activities completed during the past month in compliance with the aforementioned Agreement. It is also intended to provide a brief summary of pending and on-going activities.

Benthic Macroinvertebrate Tissue Study – TAI submitted the draft data summary report (DSR) to EPA on September 13, 2017 for review and comment.

2016 Residential Soil Study – On September 5, 2017 TAI received a letter from EPA approving the draft final DSR. At the time of writing, TAI submitted the final version of the Residential Soil Study DSR to EPA and the RI/FS distribution list on October 4, 2017. TAI also submitted the final Residential Soil Study Cultural Resource Monitoring Report to EPA on September 14, 2017.

Soil Amendment Technologies Evaluation Study (SATES) – TAI submitted the draft preliminary Phase 1 test plot screening results and summary matrix for test plot selection for characterization to the SATES team on September 22, 2017. A conference call was held with the team on September 26, 2017 to discuss the information. At the time of writing the Phase 1A field work began on October 3, 2017 and will continue until mid-October.

Plant Tissue Study – On September 19, 2017, TAI submitted review tables, figures and photos from the August 2017 field reconnaissance effort to EPA and the Confederated Tribes of the Colville Reservation (CCT) for review. On September 27, 2017 TAI received a memo from Lodestone Environmental Consulting (consultant to the CCT) “Cultural Plant Sampling Recommendations” with recommended considerations for plant sampling, with notes on uses other than direct consumption. A conference call was held

Teck American Incorporated  
PO Box 3087, Spokane, WA 99220  
Telephone: (509) 747-6111 ■ Facsimile: (509) 922-8767

USEPA SF



1528219

on September 28, 2017 with EPA, CCT and TAI to discuss the above referenced information as well as to discuss data quality objectives and study design.

Background Soil Assessment – TAI submitted letter to EPA on September 28, 2018 with attached draft data quality objectives for review in preparation for a meeting with EPA. At the time of writing, the meeting was held on October 2, 2017 and TAI is working on follow up action items.

Delineation of Upland Soil Site - TAI submitted letter to EPA on September 28, 2018 with attached draft data quality objectives for review in preparation for a meeting with EPA. At the time of writing, the meeting was held on October 2, 2017 and TAI is working on follow up action items.

#### Baseline Ecological Risk Assessment:

- On August 14, 2017 EPA provided TAI with an informal document via electronic mail outlining EPA's proposed approach from streamlining the BERA. The approach suggested that we identify and complete interim deliverables that focus on specific assessment endpoints. TAI is currently reviewing and evaluating the document.
- TAI is in receipt of a letter from EPA dated August 23, 2017 regarding EPA Review and Determination of Data Usability for Upper Columbia River Remedial Investigation BERA. At the time of writing, on October 10, 2017 TAI submitted a letter in response to EPA's August 23<sup>rd</sup> letter.
- Soil toxicity reference value development – a meeting was held in Seattle, WA with EPA and TAI on September 29, 2017 to discuss leaching-aging factors and regression-based bioavailability models.

#### Human Health Risk Assessment (HHRA):

- Following the meeting held between EPA and TAI on May 11 and 12, 2017 to discuss several topics EPA is working on to support the HHRA, EPA and TAI agreed to have monthly conference calls to continue discussion around addressing action items identified during the May meeting. The third monthly call was held on September 19, 2017.
- Recreation Consumption and Resource Use Survey – During the September 19, 2017 HHRA call, EPA and TAI continued discussion regarding the July 31, 2017 memorandum *Draft Response TAI Comments on the Draft Final Data Analysis Report for the Recreational Use Survey, Dated 6/10/16* EPA had previously provided to TAI for review. TAI will follow up with a package of information presented at the meeting and developed based on the call discussion, to EPA in mid-October.
- Tribal Consumption and Resource Use Survey – On June 27, 2016 EPA submitted the April 30, 2016 report titled "Statistical Review of a Report on Food Consumption and Resource Use among Residents of the Colville Reservation" as

prepared by The Mountain-Whisper-Light Statistics for TAI to review and provide comment. TAI provided review comments to EPA on September 26, 2016. EPA's plan for revising the document was discussed during the September 19, 2019 call with TAI.

- Estimating Dermal Absorption of Arsenic in Residential Soil – during the month of September EPA provided information on the topic and requested a conference call to discuss. At the time of writing, a conference call was held on October 3, 2017 with EPA, TAI and the authors of a subject paper to discuss recent analyses. Follow up will continue in the month of October.
- EPA provided an updated version of the HHRA conceptual site model to TAI for review on September 26, 2017.
- At the time of writing, on October 6, 2017 EPA provided a final memo with the approach that will be used to adjust soil arsenic and lead concentrations in residential soils based on relative bioavailability (RBA) in the HHRA.

Should you have any questions or require any additional information, please do not hesitate to contact me at 509-623-4501.